

**To:** Michael B. Gillett[mgillett@gillettlawfirm.com]  
**From:** Vergeront, Julie  
**Sent:** Wed 3/23/2016 6:40:56 PM  
**Subject:** RE: Multistar Industries

....  
>>>  
Mike,

It is unclear from the documents Multistar provided whether the tank rentals reflected as retail sales all reflect tanks filled with ammonia or whether all or some of the tank rentals were of empty tanks.

Under the attached OSHA interpretation, only income the facility receives from sales of the chemical covered under the PSM standard (here, ammonia) are considered in determining whether the facility qualifies for the retail exemption to OSHA's PSM requirements.

We ask that Multistar clarify this issue. Please provide a response by tomorrow, Thursday, March 24<sup>th</sup>. This clarification should also be addressed by a certification by Multistar as to truth, accuracy and completeness.

Please let me know if you have any questions.

Regards,

**Julie A. Vergeront**

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**From:** Michael B. Gillett [mailto:mgillett@gillettlawfirm.com]  
**Sent:** Tuesday, March 22, 2016 2:57 PM  
**To:** Vergeront, Julie  
**Subject:** Multistar Industries

Julie,

The attached link will take you to the retail facility documentation:

[https://onedrive.live.com/redir?resid=888D9DD6002616B3!5199&authkey=!ABTemldc\\_DzXRjs&ithint=folder](https://onedrive.live.com/redir?resid=888D9DD6002616B3!5199&authkey=!ABTemldc_DzXRjs&ithint=folder)

Michael B. Gillett

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